

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

February 15, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

RECEIVED

ES/UP
FEB 23 2006

**AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5**

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

February 15, 2006

RECEIVED

FEB 23 2006

AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	1/17/2006 8:44:26 PM	1/17/2006 9:43:23 PM	Drum Feed	Bypass profile. Restart unit.	0	58	57
2	SCC Temperature	1/26/2006 3:53:30 PM	1/26/2006 4:02:31 PM	Lance Feeds	Restarted unit. Increased lance flows.	0	9	1
3	SCC Pressure Using Seals	1/26/2006 6:55:58 PM	1/26/2006 6:56:03 PM	Drum Feed	Maintain draft using ID fan damper	0	0	5
4	SCC Pressure Using Seals	1/26/2006 8:39:21 PM	1/26/2006 8:39:26 PM	Drum Feeds	Reduce Feeds. Maintain draft using ID fan damper	0	0	5
4	SCC Pressure Using Seals	1/26/2006 8:39:29 PM	1/26/2006 8:39:31 PM	Drum Feeds	Reduce Feeds. Maintain draft using ID fan damper	0	0	2
5	THC	1/27/2006 2:24:00 PM	1/27/2006 3:21:28 PM	Drum Feed	Split profile. Restart Unit.	0	57	28
6	SCC Pressure Using Seals	1/27/2006 8:39:11 PM	1/27/2006 8:39:16 PM	Drum Feed	Maintain draft using ID fan damper	0	0	5
7	SCC Temperature	2/4/2006 12:09:45 PM	2/4/2006 12:51:51 PM	Lance Feed	Regained temperature. Restarted Unit.	0	42	6
8	SCC Temperature	2/5/2006 5:43:43 AM	2/5/2006 6:30:49 AM	Lance Feed	Regained temperature. Restarted Unit.	0	47	6
9	THC	2/10/2006 6:03:28 PM	2/10/2006 7:04:52 PM	Bulk Feed	Reduced crane weight and mix pit waste. Restart Unit	1	1	24
10	THC	2/11/2006 12:40:26 AM	2/11/2006 1:02:48 AM	Bulk Rollover	Reduced crane weight and mix pit waste. Restart Unit	0	22	22

** End of report **

RECEIVED

FEB 23 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

February 28, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

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Eds/UG
MAR 02 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

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EXCESSIVE EXCEEDANCE REPORTING

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Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

February 28, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	SCC Temperature	2/11/2006 5:48:32 AM	2/11/2006 5:58:55 AM	Lance - Feed Rate	Regained temp with clean fuels.	0	10	23
2	SCC Pressure Using Seals	2/14/2006 1:36:55 AM	2/14/2006 1:36:58 AM	Drum Feeds	Maintain draft using ID fan damper	0	0	3
2	SCC Pressure Using Seals	2/14/2006 1:37:05 AM	2/14/2006 1:37:11 AM	same event as previous	Maintain draft using ID fan damper	0	0	6
3	SCC Temperature	2/14/2006 4:35:09 AM	2/14/2006 4:49:15 AM	Lance - Feed Rate	Regained temp with clean fuels.	0	14	6
4	SCC Pressure Using Seals	2/14/2006 10:12:21 AM	2/14/2006 10:12:23 AM	Bulk Rollover	Maintain draft using ID fan damper	0	0	2
4	SCC Pressure Using Seals	2/14/2006 10:12:29 AM	2/14/2006 10:12:35 AM	same event as previous	Maintain draft using ID fan damper	0	0	6
5	SCC Temperature	2/14/2006 6:00:12 PM	2/14/2006 6:05:12 PM	Lance - Feed Rate	Regained temp with clean fuels.	0	5	0
6	SCC Pressure Using Seals	2/15/2006 12:47:24 PM	2/15/2006 12:47:32 PM	Operator Error	Regained seal pressure. Restarted Unit	0	0	8
7	THC	2/17/2006 10:12:28 PM	2/17/2006 11:10:26 PM	Drum Feed	Restart Unit.	0	57	58
8	THC	2/18/2006 11:51:23 AM	2/18/2006 12:12:22 PM	Bulk Rollover	Restart unit.	0	20	59
9	SCC Temperature	2/19/2006 1:45:28 AM	2/19/2006 2:01:28 AM	Lance - Feed Rate	Regain temp. with clean fuels. Restart Unit.	0	16	0
10	THC	2/23/2006 2:40:31 PM	2/23/2006 3:39:27 PM	Bulk Feed	Mixed pit. Restarted Unit.	0	58	56

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

March 17, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RECEIVED
MAR 22 2006
AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5
es/ur

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

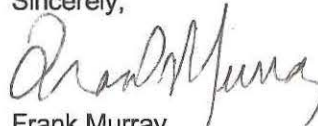
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Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

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MAR 22 2006

AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

March 17, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	2/23/2006 6:40:34 PM	2/23/2006 7:35:27 PM	Bulk Feed	Reduced Feeds. Restarted Unit.	0	54	53
2	THC	2/26/2006 9:10:25 AM	2/26/2006 10:11:22 AM	Drum Feed	Restarted Unit	1	0	57
3	SCC Pressure Using Seals	3/8/2006 6:35:22 AM	3/8/2006 6:35:29 AM	Drum Feed	Maintain draft using ID fan damper	0	0	7
4	THC	3/8/2006 10:55:32 AM	3/8/2006 11:40:29 AM	Drum Feed	Altered feed prep. Restarted Unit	0	44	57
5	THC	3/8/2006 5:22:29 PM	3/8/2006 6:06:23 PM	Drum Feed	Split material, restart unit.	0	43	54
6	THC	3/9/2006 9:41:26 AM	3/9/2006 10:39:22 AM	Drum Feed	Restarted Unit.	0	57	56
6	SCC Pressure Using Seals	3/9/2006 9:44:18 AM	3/9/2006 9:44:21 AM	Same cause as previous event	Maintain draft using ID fan damper	0	0	3
7	SCC Pressure Using Seals	3/9/2006 8:45:40 PM	3/9/2006 8:45:44 PM	Drum Feed	Maintain draft using ID fan damper.	0	0	4
8	SCC Temperature	3/11/2006 10:55:52 AM	3/11/2006 11:12:51 AM	Lance - Feed rate	Regained temp with fuels	0	16	59
9	THC	3/11/2006 12:08:52 PM	3/11/2006 1:04:46 PM	Drum Feeds	Reduced feeds and restarted unit.	0	55	54
10	THC	3/12/2006 3:55:28 AM	3/12/2006 4:29:28 AM	Drum Feed	Bypass profile. Restart Unit.	0	34	0

** End of report **

Von Roll America, Inc.

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East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

RECEIVED

APR 06 2006 *efs/UP*

**AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5**

April 1, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

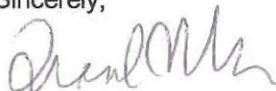
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Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

April 1, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	3/12/2006 5:12:48 PM	3/12/2006 6:12:32 PM	Drum Feed	Bypass profile. Restart Unit.	0	59	44
2	THC	3/12/2006 6:50:36 PM	3/12/2006 7:50:38 PM	Drum Feed	Bypass profile. Restart Unit.	1	0	2
3	THC	3/18/2006 7:15:33 AM	3/18/2006 8:20:25 AM	Drum Feed	Bypass profile. Restart Unit	1	4	52
4	THC	3/19/2006 2:37:05 PM	3/19/2006 3:38:01 PM	Drum Feed	Split profile. Restart unit.	1	0	56
5	THC	3/19/2006 5:35:06 PM	3/19/2006 6:34:01 PM	Drum Feed	Split profile. Restart unit.	0	58	55
6	THC	3/19/2006 8:32:18 PM	3/19/2006 9:02:19 PM	Drum Feed	Split profile. Restart unit.	0	30	1
7	THC	3/20/2006 2:47:27 PM	3/20/2006 3:38:10 PM	Drum Feed	Split profile. Restart unit.	0	50	43
8	THC	3/24/2006 11:41:28 AM	3/24/2006 12:41:29 PM	Drum Feed	Restart Unit	1	0	1
9	THC	3/24/2006 2:05:29 PM	3/24/2006 2:24:27 PM	Drum Feed	Restart unit.	0	18	58
10	SCC Pressure Using Seals	3/27/2006 9:44:55 PM	3/27/2006 9:44:58 PM	Bulk Feed	Reduce crane loads. Maintain draft using ID Fan damper.	0	0	3

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

April 11, 2006
VIA UPS

RECEIVED

APR 14 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
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RE: VON ROLL AMERICA, INC.
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Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	3/31/2006 9:50:16 AM	3/31/2006 10:47:21 AM	Drum Feed	Restart unit.	0	57	5
2	THC	4/1/2006 12:23:22 PM	4/1/2006 12:56:21 PM	Drum Feed	Check drum prep. Restart unit.	0	32	59
2	THC	4/1/2006 1:03:19 PM	4/1/2006 1:11:20 PM	Same event as previous	Check drum prep. Restart unit.	0	8	1
3	SCC Pressure Using Seals	4/2/2006 9:01:29 PM	4/2/2006 9:01:34 PM	Drum Feed	Maintain draft using ID fan damper.	0	0	5
4	THC	4/4/2006 4:39:12 PM	4/4/2006 5:16:29 PM	Drum Feed	Reduced charge size. Restarted unit.	0	37	17
5	THC	4/5/2006 7:29:16 AM	4/5/2006 7:56:24 AM	Drum Feeds	Restart unit	0	27	8
6	THC	4/5/2006 2:26:17 PM	4/5/2006 3:24:25 PM	Drum Feed	Restart unit	0	58	8
7	THC	4/5/2006 7:08:34 PM	4/5/2006 8:09:28 PM	Drum Feed	Bypass profile. Restart unit	1	0	54
8	SCC Temperature	4/5/2006 10:03:31 PM	4/5/2006 10:05:29 PM	Operator Error	Regained temp with clean fuels	0	1	58
9	SCC Temperature	4/6/2006 12:53:28 AM	4/6/2006 1:09:29 AM	Feed - Lance	Regained temp with clean fuels	0	16	1
10	THC	4/7/2006 4:29:29 AM	4/7/2006 5:29:21 AM	Drum Feeds	Bypass profile. Restart unit	0	59	52

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

May 8, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

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MAY 10 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

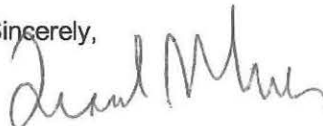
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Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

May 8, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	SCC Pressure Using Seals	4/17/2006 8:07:28 AM	4/17/2006 8:07:31 AM	Drum Feed	Maintain draft using ID fan damper. Restart unit.	0	0	3
2	THC	4/18/2006 6:15:28 PM	4/18/2006 6:44:21 PM	Drum/Lance Feed	Restart Unit. Changed T-2 strainers.	0	28	53
3	THC	4/20/2006 2:11:24 PM	4/20/2006 3:13:21 PM	Drum Feed	Restart Unit	1	1	57
4	THC	4/20/2006 9:29:28 PM	4/20/2006 10:13:32 PM	Drum Feed	Restart Unit. Bypass profile.	0	44	4
5	THC	4/20/2006 11:10:31 PM	4/21/2006 12:07:27 AM	Drum Feed	Restart Unit. Bypass profile.	0	56	56
6	THC	4/21/2006 8:32:28 AM	4/21/2006 9:32:30 AM	Drum Feed	Restart Unit.	1	0	2
8	THC	4/29/2006 7:07:33 PM	4/29/2006 8:08:27 PM	Drum Feed	Bypassed profile. Restarted Unit.	1	0	54
9	THC	5/1/2006 12:10:37 AM	5/1/2006 1:11:31 AM	Drum Feed	Bypassed profile and restarted unit.	1	0	54
10	THC	5/3/2006 11:50:49 PM	5/4/2006 12:50:50 AM	Drum Feed	Restarted Unit.	1	0	1

** End of report **

RECEIVED

JUN 02 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

ESL
VonRoll WTI
Setting Tomorrow's Standards Today
ISO 9001 ISO 14001

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

May 25, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

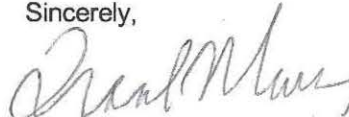
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Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

May 25, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(Hr)	(Min)	(Sec)
1	THC	5/6/2006 1:58:32 AM	5/6/2006 2:46:33 AM	Drum Feed	Restarted Unit.	0	48	1
2	THC	5/8/2006 9:39:29 PM	5/8/2006 10:36:24 PM	Drum Feed	Restarted Unit.	0	56	55
3	THC	5/9/2006 12:13:22 AM	5/9/2006 1:15:22 AM	Drum Feed	Restarted Unit.	1	2	0
4	THC	5/10/2006 7:22:31 PM	5/10/2006 7:38:29 PM	Drum Feed	Restarted Unit.	0	15	58
5	THC	5/10/2006 9:46:59 PM	5/10/2006 9:54:28 PM	Drum Feed	Restarted Unit. Bypass profile	0	7	29
6	THC	5/14/2006 1:49:33 AM	5/14/2006 2:46:30 AM	Drum Feed	Restarted Unit. Bypass profile	0	56	57
7	THC	5/18/2006 9:31:26 PM	5/18/2006 10:31:23 PM	Drum Feed	Restart unit	0	59	57
8	THC	5/20/2006 2:13:30 AM	5/20/2006 3:13:23 AM	Drum Feed	Restart unit	0	59	53
9	SCC Pressure Using Seals	5/22/2006 7:54:32 PM	5/22/2006 7:54:34 PM	Drum Feed	Maintain system draft using ID fan damper	0	0	2
9	SCC Pressure Using Seals	5/22/2006 7:54:39 PM	5/22/2006 7:54:44 PM	Drum Feed	Maintain system draft using ID fan damper	0	0	5
10	THC	5/23/2006 3:36:54 PM	5/23/2006 4:36:56 PM	Drum Feed	Reduced lances and restarted unit.	1	0	2

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

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JUL 06 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

June 30, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

June 30, 2006

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	SCC Temperature	5/27/2006 1:33:42 AM	5/27/2006 1:51:31 AM	Operator Error	Regained temp using fuels	0	17	49
2	THC	6/1/2006 4:26:27 PM	6/1/2006 5:26:21 PM	Drum Feed	Restart unit	0	59	54
3	THC	6/8/2006 3:52:12 PM	6/8/2006 4:44:22 PM	Drum Feed	Restart unit	0	52	10
4	SCC Pressure Using Seals	6/9/2006 1:54:50 AM	6/9/2006 1:54:54 AM	Drum Feed	Maintain system draft using ID fan damper	0	0	4
4	SCC Pressure Using Seals	6/9/2006 1:54:58 AM	6/9/2006 1:55:06 AM	Same as prior event	Maintain system draft using ID fan damper	0	0	8
5	THC	6/9/2006 1:59:22 AM	6/9/2006 2:58:20 AM	Drum Feed	Restart unit	0	58	58
6	THC	6/13/2006 12:32:32 PM	6/13/2006 1:31:29 PM	Drum Feed	Restarted unit.	0	58	57
7	THC	6/19/2006 3:56:58 AM	6/19/2006 4:56:50 AM	Drum Feed	Restarted unit and bypassed profile.	0	59	52
8	THC	6/20/2006 3:49:03 PM	6/20/2006 4:49:02 PM	Drum Feed	Restarted unit.	0	59	59
9	THC	6/21/2006 4:32:29 PM	6/21/2006 4:38:28 PM	Lance Feed	Restarted Unit.	0	5	59
10	THC	6/26/2006 6:26:27 PM	6/26/2006 7:25:25 PM	Drum Feed	Restart Unit	0	58	58

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

July 17, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

RECEIVED
attn
JUL 19 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

July 17, 2006

RECEIVED

JUL 19 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	RJ Sump Level	6/26/2006 11:42:26 PM	6/27/2006 1:02:29 AM	Operator Error	Re-established flow to scrubber	1	20	3
1	RJ DP	6/26/2006 11:53:27 PM	6/27/2006 12:47:25 AM	Operator Error	Re-established flow to scrubber	0	53	58
1	RJ Blowdown Flow	6/27/2006 12:32:27 AM	6/27/2006 12:48:28 AM	Operator Error	Re-established flow to scrubber	0	16	1
2	SCC Pressure Using Seals	6/28/2006 10:35:10 AM	6/28/2006 10:35:13 AM	Bulk Feed	Discontinued feeds from pit #2. Maintain system draft using ID fan damper	0	0	3
2	SCC Pressure Using Seals	6/28/2006 10:35:17 AM	6/28/2006 10:35:32 AM	Same as prior event	Discontinued feeds from pit #2. Maintain system draft using ID fan damper	0	0	15
3	THC	6/28/2006 10:39:26 AM	6/28/2006 11:41:32 AM	Bulk Feed	Discontinued feeds from pit #2. Restart unit.	1	2	6
4	THC	6/30/2006 11:58:28 AM	6/30/2006 1:04:41 PM	Drum Feed	Restart Unit	1	6	13
5	THC	6/30/2006 2:27:26 PM	6/30/2006 2:48:26 PM	Lance Feed	Restart Unit	0	21	0
6	THC	6/30/2006 8:20:27 PM	6/30/2006 9:19:27 PM	Unknown Feed	Restart Unit	0	59	0
7	THC	7/11/2006 5:51:29 PM	7/11/2006 6:04:28 PM	Bulk Feed	Reduced Loads. Restarted Unit	0	12	59
8	THC	7/11/2006 8:59:29 PM	7/11/2006 10:01:29 PM	Bulk Feed	Restarted Unit.	1	2	0
9	THC	7/12/2006 1:01:31 AM	7/12/2006 1:58:29 AM	Bulk Feed	Restarted Unit.	0	56	58
10	SCC Pressure Using Seals	7/12/2006 3:57:22 AM	7/12/2006 3:57:25 AM	Drum Feed	Maintained system draft using ID fan damper	0	0	3
10	SCC Pressure Using Seals	7/12/2006 3:57:30 AM	7/12/2006 3:57:32 AM	Same as prior event	Maintained system draft using ID fan damper	0	0	2

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

August 1, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604



Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

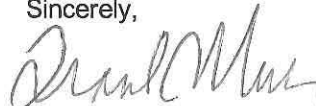
Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	7/12/2006 7:44:30 PM	7/12/2006 8:45:32 PM	Drum Feed	Restarted Unit	1	1	2
2	SCC Temperature	7/14/2006 5:47:38 AM	7/14/2006 5:51:29 AM	Insufficient Waste Feeds	Regained temperature using fuels	0	3	51
3	THC	7/17/2006 6:09:23 PM	7/17/2006 6:52:21 PM	Drum Feed	Restarted Unit	0	42	58
4	SCC Pressure Using Seals	7/18/2006 7:46:09 AM	7/18/2006 7:46:17 AM	Drum Feed	Bypassed profile. Restarted unit.	0	0	8
5	SCC Pressure Using Seals	7/18/2006 1:34:50 PM	7/18/2006 1:34:53 PM	Drum Feed	Bypassed profile. Restarted unit.	0	0	3
6	THC	7/19/2006 8:36:45 AM	7/19/2006 9:37:01 AM	Drum Feed	Bypassed profile. Restarted unit.	1	0	16
7	THC	7/22/2006 1:53:29 PM	7/22/2006 2:02:23 PM	Drum Feed	Bypassed profile. Restarted unit.	0	8	54
8	SCC Pressure Using Seals	7/26/2006 12:42:59 PM	7/26/2006 12:43:05 PM	Drum Feed	Reduced burner.	0	0	6
9	SCC Pressure Using Seals	7/26/2006 1:39:24 PM	7/26/2006 1:39:27 PM	Drum Feed	Further reduced burner	0	0	3
10	THC	7/27/2006 6:18:27 AM	7/27/2006 7:16:21 AM	Drum Feed	Restarted Unit	0	57	54

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

August 30, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

RECEIVED
SEP 07 2006
AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING


Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,



Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

August 30, 2006

RECEIVED

SEP 07 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	7/28/2006 11:48:05 AM	7/28/2006 12:48:24 PM	Drum Feed	Restarted Unit	1	0	19
2	THC	7/28/2006 8:39:28 PM	7/28/2006 9:40:26 PM	Drum Feed	Restarted Unit	1	0	58
3	THC	7/28/2006 10:14:28 PM	7/28/2006 10:52:23 PM	Drum Feed	Restarted Unit	0	37	55
4	THC	8/14/2006 5:36:02 PM	8/14/2006 6:36:56 PM	Drum Feed	Restarted Unit	1	0	54
5	THC	8/20/2006 11:52:30 PM	8/21/2006 12:09:32 AM	Bulk Feed	Restarted Unit	0	17	2
6	THC	8/21/2006 7:17:40 AM	8/21/2006 8:17:31 AM	Drum Feed	Restarted Unit	0	59	51
7	THC	8/23/2006 10:36:26 AM	8/23/2006 11:36:29 AM	Drum Feed	Split Profile, Restart Unit	1	0	3
8	THC	8/23/2006 12:40:30 PM	8/23/2006 12:53:29 PM	Unknown Feed	Restart Unit	0	12	59
9	THC	8/23/2006 9:20:28 PM	8/23/2006 9:27:23 PM	Drum Feed	Restart Unit	0	6	55
10	THC	8/25/2006 8:30:34 AM	8/25/2006 8:39:26 AM	Drum Feed	Reduce charge size. Restart Unit.	0	8	52

** End of report **

RECEIVED

SEP 07 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

September 7, 2006
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

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Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	8/25/2006 10:13:32 PM	8/25/2006 11:14:30 PM	Drum Feed	Restart Unit	1	0	58
2	SCC Temperature	8/26/2006 11:57:29 AM	8/26/2006 11:58:32 AM	Lance Feeds	Regained temperature using clean fuels	0	1	3
2	SCC Temperature	8/26/2006 12:00:25 PM	8/26/2006 12:05:26 PM	Same as Prior Event	Same as Prior Event	0	5	1
3	THC	8/26/2006 8:37:32 PM	8/26/2006 9:10:26 PM	Unknown Feed	Restarted Unit	0	32	54
4	THC	8/27/2006 5:25:31 AM	8/27/2006 6:09:28 AM	Drum Feed	Restarted Unit	0	43	57
5	THC	8/27/2006 7:53:33 AM	8/27/2006 8:49:21 AM	Drum Feed	Restarted Unit	0	55	48
6	THC	8/27/2006 9:05:29 AM	8/27/2006 10:06:27 AM	Drum Feed	Reduce charge size. Restart Unit	1	0	58
7	THC	8/27/2006 9:36:42 PM	8/27/2006 9:56:44 PM	Drum Feed	Restart Unit	0	20	2
8	THC	8/28/2006 3:29:26 AM	8/28/2006 4:37:22 AM	Drum Feed	Reduce charge size. Restart Unit	1	7	56
9	THC	8/30/2006 1:38:22 AM	8/30/2006 2:06:23 AM	Drum Feed	Restart Unit	0	28	1
10	THC	8/31/2006 5:53:33 PM	8/31/2006 6:21:37 PM	Drum Feed	Restart Unit	0	28	4

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

March 18, 2007
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

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Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Murray".

Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

March 18, 2007

Events

#	Name	Start Time	End Time	Cause (report)	Corrective Actions	(hr)	(min)	(sec)
1	THC	1/18/2007 4:39:32 PM	1/18/2007 5:38:32 PM	Operator Error - Improper charge size	Reviewed packaging. Restarted unit.	0	59	0
2	SCC Pressure Using Seals	1/29/2007 8:05:58 PM	1/29/2007 8:06:01 PM	Operator Error - Improper charge size	Revised feed plan. Restarted unit.	0	0	3
2	THC	1/29/2007 8:09:23 PM	1/29/2007 9:11:23 PM	Same as prior event	Revised feed plan. Restarted unit.	1	2	0
3	THC	1/31/2007 5:22:24 AM	1/31/2007 6:24:21 AM	Operator Error - Improper charge size	Revised feed plan. Restarted unit.	1	1	57
4	SCC Pressure Using Seals	2/13/2007 6:28:59 AM	2/13/2007 6:29:20 AM	Operator Error - Not following C/A	Maintained Draft using ID Fan damper. Split to smaller charges.	0	0	21
5	THC	2/22/2007 12:08:31 PM	2/22/2007 12:53:28 PM	Operator Error - Bad Split	Revised split instructions.	0	44	57
6	THC	2/22/2007 6:50:30 PM	2/22/2007 7:12:30 PM	Operator Error - Bad Split	Reviewed feed prep with employees	0	22	0
7	SCC Pressure Using Seals	3/13/2007 5:10:40 PM	3/13/2007 5:10:44 PM	Operator Error - Feed Mix	Implement new feed guidelines and install safeguards	0	0	4
8	SCC Pressure Using Seals	3/13/2007 8:42:05 PM	3/13/2007 8:42:08 PM	Operator Error - Feed Mix	Implement new feed guidelines and install safeguards	0	0	3
8	SCC Pressure Using Seals	3/13/2007 8:42:12 PM	3/13/2007 8:42:14 PM	Same event as previous	Implement new feed guidelines and install safeguards	0	0	2
9	SCC Pressure Using Seals	3/13/2007 10:53:10 PM	3/13/2007 10:53:13 PM	Operator Error - Feed Prep	Re-train technician on proper feed prep.	0	0	3
10	SCC Pressure Using Seals	3/14/2007 1:52:32 AM	3/14/2007 1:52:35 AM	Operator Error - Feed Mix	Implement new feed guidelines and install safeguards	0	0	3

** End of report **

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

May 31, 2007
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604



Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

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Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	4/4/2007 3:42:23 AM	4/4/2007 4:04:23 AM	Operator Error - Drum Feed	Operator trainee fed drum during period of high THC	Re-trained operator.	0	22	0
2	THC	4/7/2007 1:13:44 AM	4/7/2007 2:09:36 AM	Operator Error - Poor Maintenance	Operating direct tanker with manual valve only resulted in THC spike.	Automated valve installed 4/7/07	0	55	52
3	SCC Pressure Using Seals	4/21/2007 7:24:39 PM	4/21/2007 7:24:49 PM	Operator Error - Feed Size	Technician fed drum at too high a weight	Re-trained technician. Maintained draft using ID fan damper	0	0	10
3	THC	4/21/2007 7:28:24 PM	4/21/2007 8:28:23 PM	Operator Error - Feed Size	Same cause as prior event	Re-trained technician	0	59	59
4	THC	4/27/2007 3:12:21 PM	4/27/2007 4:14:23 PM	Operator Error - Drum Feed	Drum feed at improper charge caused THC exceedance	Review packaging with customer	1	2	2
5	RJ DP	5/11/2007 6:08:34 PM	5/11/2007 6:33:30 PM	Operator Error - Poor Operation	Operator did not make necessary adjustments in time to prevent OPL exceedance.	Operator re-established OPL	0	24	56
6	THC	5/12/2007 12:06:33 AM	5/12/2007 1:01:32 AM	Operator Error - Drum Feed	Drum feed at excessive weight caused THC exceedance	Restarted unit. Reviewed feed prep.	0	54	59
7	RJ DP	5/12/2007 8:32:31 PM	5/12/2007 8:39:31 PM	Operator Error - Poor Operation	Operator did not make necessary adjustments in time to prevent OPL exceedance.	Operator re-established OPL	0	7	0
8	THC	5/19/2007 10:15:34 PM	5/19/2007 11:16:35 PM	Operator Error - Drum Feed	Drum fed with too much liquid caused poor combustion	Revised waste streams feed plan.	1	1	1
9	SCC Pressure Using Seals	5/21/2007 2:55:52 PM	5/21/2007 2:55:55 PM	Operator Error - Poor Operation	Altering of inlet shroud damper caused exceedance of seal pressure set point	Maintained draft and re-established damper position	0	0	3
10	THC	5/26/2007 1:41:22 PM	5/26/2007 2:42:21 PM	Operator Error - Lance over fire	Operator over fired lances trying to regain temp.	Restarted unit	1	0	59

** End of report **



Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

August 28, 2007
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

This report is being submitted outside of the five-day reporting window. Initial investigations showed several of the events contained in this report to have been caused by process malfunctions. However, further evidence has revealed that the events were the result of operator error and required reporting. Von Roll apologizes for the delay.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,


Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

August 28, 2007

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	SCC Pressure Using Seals	6/29/2007 2:31:55 PM	6/29/2007 2:31:57 PM	Operator Error- Feed Prep	Poor feed prep led to pressure trip	Maintained draft using ID fan damper.	0	0	2
2	THC	7/9/2007 7:30:28 AM	7/9/2007 8:28:26 AM	Operator Error - Poor Communication	DDP operator failed to communicate waste stream change to control room	Reviewed procedure with operator. Restarted unit.	0	57	58
3	THC	7/19/2007 5:03:28 PM	7/19/2007 5:57:29 PM	Operator Error - Feed Prep	Feed prep procedure not followed leading to THC spike	Re-trained technician on prep instructions.	0	54	1
4	THC	7/30/2007 10:05:27 AM	7/30/2007 11:00:25 AM	Operator Error - Lance Feed	Improper lance start-up led to THC exceedance	Procedure reviewed with operator. Restarted unit.	0	54	58
5	SCC Temperature	8/9/2007 8:09:33 AM	8/9/2007 8:17:37 AM	Operator Error	Incinerator operator allowed hourly temp OPL to drop below limit.	Re-gained temperature using clean fuels	0	8	4
6	SCC Temperature	8/17/2007 4:55:31 PM	8/17/2007 5:16:02 PM	Operator Error	Control room operator failed to maintain OPL after WFCO	Regained temperature using gas burner	0	20	31
7	SCC Pressure Using Seals	8/19/2007 12:04:08 AM	8/19/2007 12:04:13 AM	Operator Error - Drum Feed	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	5
7	SCC Pressure Using Seals	8/19/2007 12:04:16 AM	8/19/2007 12:04:18 AM	same cause as prior event	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
8	SCC Pressure Using Seals	8/19/2007 2:35:11 PM	8/19/2007 2:35:13 PM	Operator Error - Drum Feed	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
8	SCC Pressure Using Seals	8/19/2007 2:35:18 PM	8/19/2007 2:35:21 PM	Same event as previous	Ash clinker fell into slag quench causing steam expansion	Re-gained draft using ID fan damper. Reduced drum weights	0	0	3
9	SCC Pressure Using Seals	8/20/2007 12:16:53 AM	8/20/2007 12:16:55 AM	Operator Error - Drum Feed	Operator did not make corrective action from last event involving this material	Removed waste stream from pick list and revised feed prep	0	0	2
10	SCC Pressure Using Seals	8/20/2007 1:29:27 AM	8/20/2007 1:29:34 AM	Operator Error - Drum Feed	Operator did not make corrective action from last event involving this material	Removed waste stream from pick list and revised feed prep	0	0	7
10	SCC Pressure Using Seals	8/20/2007 1:29:37 AM	8/20/2007 1:29:39 AM	Same event as previous	Ash clinker fell into slag quench causing steam expansion	Reduced feeds. Re-established draft	0	0	2

** End of report *

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

October 5, 2007
VIA UPS



Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Murray". The signature is fluid and cursive, with a large, stylized "M" and "F".

Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

October 5, 2007

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	SCC Pressure Using Seals	8/20/2007 11:06:46 PM	8/20/2007 11:06:52 PM	Operator Error - Drum Feed	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	6
1	SCC Pressure Using Seals	8/20/2007 11:06:55 PM	8/20/2007 11:06:57 PM	Same event as previous	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	2
2	SCC Pressure Using Seals	8/21/2007 12:27:16 AM	8/21/2007 12:27:20 AM	Operator Error - Drum Feed	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	4
3	SCC Pressure Using Seals	8/21/2007 2:46:38 AM	8/21/2007 2:46:45 AM	Operator Error - Drum Feed	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	7
3	SCC Pressure Using Seals	8/21/2007 2:46:48 AM	8/21/2007 2:46:58 AM	Same event as previous	Over weight drum feeds caused pressure spikes	Re-gained draft using ID fan damper. Reduced drum weights	0	0	10
3	THC	8/21/2007 2:53:10 AM	8/21/2007 3:50:28 AM	Same event as previous	Over weight drum feeds caused THC spike	Restarted unit. Reduced drum weights	0	57	18
4	SCC Pressure Using Seals	8/21/2007 3:24:29 PM	8/21/2007 3:24:35 PM	Operator Error - Drum Feed	Over weight drum feeds caused THC spike	Restarted unit. Reduced drum weights	0	0	6
5	SCC Pressure Using Seals	8/21/2007 7:18:16 PM	8/21/2007 7:18:22 PM	Operator Error - Drum Feed	Over weight drum feeds caused THC spike	Restarted unit. Reduced drum weights	0	0	6
6	SCC Pressure Using Seals	8/22/2007 6:31:56 AM	8/22/2007 6:31:59 AM	Operator Error - Drum Feed	Over weight drum feeds caused THC spike	Restarted unit. Reduced drum weights	0	0	3
6	SCC Pressure Using Seals	8/22/2007 6:32:04 AM	8/22/2007 6:32:06 AM	Same event as previous	Over weight drum feeds caused THC spike	Restarted unit. Reduced drum weights	0	0	2
7	THC	8/28/2007 3:07:26 AM	8/28/2007 4:07:27 AM	Operator Error - Feed Prep	Operator failed to follow feed prep guidelines	feed prep reviewed. Unit restarted.	1	0	1
8	SCC Pressure Using Seals	9/6/2007 8:52:44 PM	9/6/2007 8:52:48 PM	Operator Error - Feed Prep	Operator failed to follow feed prep guidelines	feed prep reviewed. Unit restarted.	0	0	4
9	THC	9/11/2007 4:37:00 PM	5/31/2007 5:31:00 PM	Operator Error - Feed Prep	Operator did not follow proper feed prep causing THC exceedance	Feed prep instructions to be placed on containers. Restart unit.	23	6	0
10	SCC Temperature	9/30/2007 5:09:26 AM	9/30/2007 5:38:26 AM	Operator Error - Poor Operation	Operator did not perform necessary actions to maintain temperature.	Regained temperature. Restarted unit.	0	29	0

** End of report

Von Roll America, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400

Telephone 330-385-7336
Telefax 330-385-7813

October 31, 2007
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: VON ROLL AMERICA, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Von Roll America. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

This report is being submitted outside of the five-day reporting window. Initial investigations showed several of the events contained in this report to have been caused by process malfunctions. However, further evidence has revealed that the events were the result of operator error and required reporting. Von Roll apologizes for the delay.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager

cc: Ed Fasco, Ohio EPA-DAPC-NEDO

MACT EXCESSIVE EXCEEDANCE REPORT

Von Roll America, Inc

October 31, 2007

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	SCC Pressure Using Seals	10/5/2007 12:45:54 AM	10/5/2007 12:46:00 AM	Operator Error - Poor Feed Mix	Incompatible feeds caused kiln pressure	Maintain draft using ID fan damper. Revised feed mix	0	0	6
2	SCC Pressure Using Seals	10/5/2007 1:02:34 PM	10/5/2007 1:02:36 PM	Operator Error - Poor Feed Prep	Poorly prepped drum led to pressure exceedance	Review feed prep with technician. Restart unit.	0	0	2
2	THC	10/5/2007 1:09:33 PM	10/5/2007 2:06:31 PM	Same event as previous	Same event as previous	Review feed prep with technician. Restart unit.	0	56	58
3	SCC Pressure Using Seals	10/5/2007 4:47:05 PM	10/5/2007 4:47:11 PM	Operator Error - Poor Feed Prep	Poorly prepped drum led to pressure exceedance	Revise feed prep. Maintain Draft.	0	0	6
4	SCC Pressure Using Seals	10/5/2007 5:14:32 PM	10/5/2007 5:14:35 PM	Operator Error - Poor Feed Prep	Poorly prepped drum led to pressure exceedance	Revise feed prep. Maintain Draft.	0	0	3
5	SCC Pressure Using Seals	10/5/2007 10:18:22 PM	10/5/2007 10:18:26 PM	Operator Error - Poor Feed Prep	Poorly prepped drum led to pressure exceedance	Revise feed prep. Maintain Draft.	0	0	4
6	Kiln Temperature	10/7/2007 9:12:25 AM	10/7/2007 9:16:25 AM	Operator Error - Poor operation	Operator failed to take necessary measures to maintain temperature	Regained temperature. Restarted unit.	0	4	0
7	THC	10/9/2007 11:39:28 PM	10/10/2007 12:40:54 AM	Operator Error - Charge Size	Drum fed a too large a charge caused THC spike	Reviewed feed prep. Restarted unit.	1	1	26
8	THC	10/11/2007 4:13:23 AM	10/11/2007 4:30:22 AM	Operator Error - Poor operation	Operator managed lances poorly after AWFCO	Restarted unit.	0	16	59
9	THC	10/12/2007 1:24:22 PM	10/12/2007 1:41:23 PM	Operator Error - Drum Prep	Oil not removed from drum prior to feed	Reviewed waste stream and feed prep with responsible parties.	0	17	1
10	THC	10/13/2007 2:23:23 PM	10/13/2007 3:20:21 PM	Operator Error - Drum Prep	Liquid drum not solidified properly causing THC	Reviewed splitting procedure with personnel.	0	56	58

** End of report **

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

ISO 9001



ISO 14001

June 4, 2008
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604



Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



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MACT EXCESSIVE EXCEEDANCE REPORT

Heritage-WTI, Inc

June 4, 2008



Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	4/14/2008 5:50:22 PM	4/14/2008 6:50:23 PM	Operator Error- Feed Prep	Improper feed prep caused THC exceedance	Revised feed prep. Restarted unit.	1	0	1
2	THC	5/8/2008 5:57:24 AM	5/8/2008 6:55:24 AM	Operator Error -Feed Prep	Improper waste prep caused THC exceedance	Re-trained technicians. Restarted unit.	0	58	0
3	THC	5/12/2008 4:49:35 AM	5/12/2008 5:50:38 AM	Operator Error -Feed Prep	Improper waste prep caused THC exceedance	Reviewed waste feeds and restarted unit.	1	1	3
4	THC	5/14/2008 12:38:01 AM	5/14/2008 1:37:00 AM	Operator Error -Feed Prep	Improper waste prep caused THC exceedance	Reviewed waste feeds and restarted unit.	0	58	59
5	THC	5/19/2008 10:32:24 PM	5/19/2008 11:32:22 PM	Operator Error -Feed Prep	Poor feed prep caused THC exceedance.	Reviewed feed prep instructions and restarted unit.	0	59	58
6	THC	5/21/2008 12:41:22 PM	5/21/2008 1:40:22 PM	Operator Error -Feed Prep	Poor feed prep caused THC exceedance.	Re-train technician.	0	59	0
7	THC	5/22/2008 4:35:23 PM	5/22/2008 5:35:22 PM	Operator Error -Feed Prep	Poor feed prep caused THC exceedance.	Revised feed prep. Restarted unit.	0	59	59
8	THC	5/24/2008 2:14:22 AM	5/24/2008 3:15:21 AM	Operator Error -Feed Prep	Improper feed instructions caused THC.	Revised feed instructions. Restarted unit.	1	0	59
9	SCC Temperature	5/30/2008 10:32:33 PM	5/30/2008 10:39:35 PM	Operator Error - Poor Operation	Operator did not adjust for temperature loss leading to exceedance	Adjusted lance feeds and regained temperature.	0	7	2
10	RJ DP	5/30/2008 11:42:32 PM	5/30/2008 11:44:33 PM	Operator Error - Poor Operation	Operator did not adjust for Ring Jet DP loss.	Increased process flow. Restarted unit.	0	2	1

** End of report **

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

ISO 9001

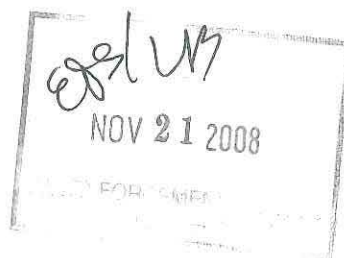


ISO 14001

November 18, 2008
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



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MACT EXCESSIVE EXCEEDANCE REPORT

Heritage-WTI, Inc

November 18, 2008

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	10/4/2008 3:23:25 AM	10/4/2008 4:23:24 AM	Operator Error - Feed Prep	Poor feed prep led to THC exceedance.	Restarted unit.	0	59	59
2	THC	10/21/2008 12:21:24 AM	10/21/2008 1:21:24 AM	Operator Error - Poor Feed Prep	Poor feed prep led to THC exceedance.	Restarted unit.	1	0	0
3	THC	10/24/2008 12:13:23 PM	10/24/2008 1:15:23 PM	Operator Error - Poor Feed Prep	Poor feed prep led to THC exceedance.	Restarted unit.	1	2	0
4	THC	10/26/2008 7:08:22 PM	10/26/2008 8:07:24 PM	Operator Error - Poor Feed Prep	Poor feed prep led to THC exceedance.	Restarted unit.	0	59	2
5	THC	10/29/2008 3:40:29 AM	10/29/2008 3:57:28 AM	Operator Error - Poor Operation	Poor operation led to THC exceedance.	Reduced feeds and restarted unit.	0	16	59
6	THC	10/31/2008 8:48:24 PM	10/31/2008 9:48:24 PM	Operator Error - Poor Feed Prep	Poor feed prep caused THC exceedance.	Reduced charge size and restarted unit.	1	0	0
7	THC	11/1/2008 3:09:24 AM	11/1/2008 4:08:23 AM	Operator Error - Incorrect Labeling	Incorrect labeling of material led to THC exceedance.	Verified waste stream and restarted unit.	0	58	59
8	THC	11/11/2008 6:34:24 PM	11/11/2008 7:33:23 PM	Operator Error - Poor Feed Prep	Container weight too heavy and caused THC exceedance.	Reduce charge size. Restart unit.	0	58	59
9	THC	11/12/2008 10:25:23 PM	11/12/2008 11:25:29 PM	Operator Error - Poor Feed Prep	Bad container split caused THC exceedance.	Restarted unit.	1	0	6
10	SCC Pressure Using Seals	11/13/2008 8:37:31 AM	11/13/2008 8:37:33 AM	Operator Error - Poor Feed Prep	Container weight too heavy and caused THC exceedance.	Reduce charge size. Restart unit.	0	0	2

** End of report **

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

ISO 9001

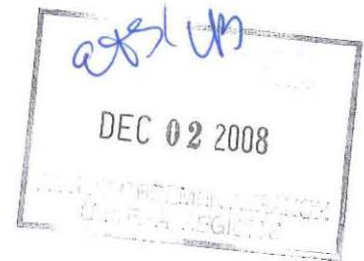


ISO 14001

November 26, 2008
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



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MACT EXCESSIVE EXCEEDANCE REPORT

Heritage-WTI, Inc

November 26, 2008

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	11/14/2008 4:51:28 PM	11/14/2008 5:51:29 PM	Operator Error - Poor Feed Prep	Container weight too heavy and caused THC exceedance.	Reduce charge size. Restart unit.	1	0	1
2	THC	11/16/2008 3:21:27 AM	11/16/2008 4:21:26 AM	Operator Error - Poor Feed Mix	Poor feed mix caused THC exceedance.	Restart Unit. Develop procedure.	0	59	59
3	THC	11/16/2008 8:30:21 AM	11/16/2008 9:30:21 AM	Operator Error - Poor Feed Prep	Container weight too heavy and caused THC exceedance.	Reduce charge size. Restart unit.	1	0	0
4	THC	11/17/2008 5:14:23 AM	11/17/2008 6:12:21 AM	Operator Error - Poor Feed Prep	Container fed with too much free liquid caused THC event.	Restarted unit. Solidified material.	0	57	58
5	THC	11/17/2008 6:22:24 AM	11/17/2008 7:23:23 AM	Operator Error - Poor Operation	Container fed improperly by operator caused THC.	Restarted unit. Reviewed feed sequence.	1	0	59
6	SCC Pressure Using Seals	11/18/2008 1:33:07 PM	11/18/2008 1:33:21 PM	Operator Error - Poor Feed Mix	Poor feed mix caused THC exceedance.	Reduced feeds. Restarted unit.	0	0	14
7	RJ DP	11/18/2008 2:15:22 PM	11/18/2008 2:31:23 PM	Operator Error - Poor Operation	Poor operation caused loss of RJ DP OPL.	Increased draft and restarted unit.	0	16	1
8	SCC Temperature	11/19/2008 7:16:26 AM	11/19/2008 7:19:30 AM	Operator Error - Poor Operation	Operator did not properly respond to temperature loss leading to OPL exceedance.	Regained temp. Restarted unit.	0	3	4
9	RJ DP	11/21/2008 2:08:23 AM	11/21/2008 2:34:24 AM	Operator Error - Poor Operation	Poor operation caused loss of RJ DP OPL.	Increased draft and restarted unit.	0	26	1
10	THC	11/21/2008 1:29:22 PM	11/21/2008 1:49:24 PM	Operator Error - Poor Feed Prep	Container weight too heavy and caused THC exceedance.	Reduced charge size. Restarted unit.	0	20	2

** End of report **

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

ISO 9001

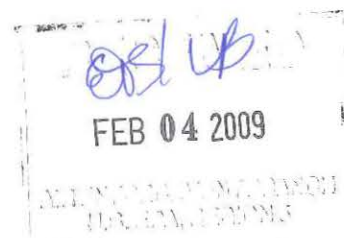


ISO 14001

January 30, 2009
VIA UPS

Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087



RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Frank Murray'.

Frank Murray
Vice President & General Manager
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



Recycled Paper

Events

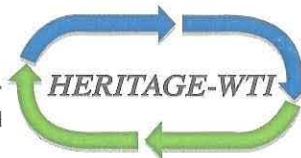
#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	11/28/2008 8:10:25 PM	11/28/2008 9:08:26 PM	Operator Error - Poor Feed Prep	Poor feed prep caused THC exceedance	Reduced charge size. Restarted unit.	0	58	1
2	THC	12/19/2008 9:28:27 AM	12/19/2008 9:32:28 AM	Operator Error - Poor Feed Prep	Poor feed prep caused THC exceedance	Unit restarted.	0	4	1
3	THC	12/19/2008 12:40:29 PM	12/19/2008 1:32:30 PM	Operator Error - Poor Operation	Improper lance feeds caused THC spike.	Unit restarted.	0	52	1
4	THC	12/20/2008 10:32:21 AM	12/20/2008 11:31:28 AM	Operator Error - Poor Feed Prep	Poor feed prep caused THC exceedance	Unit restarted.	0	59	7
5	RJ DP	1/8/2009 11:50:23 PM	1/8/2009 11:54:29 PM	Operator Error - Poor Operation	Operator improperly maintained process flow leading to exceedance.	Increased draft. Restarted unit.	0	4	6
6	THC	1/22/2009 4:14:23 AM	1/22/2009 4:45:22 AM	Operator Error - Poor Feed Prep	Poor feed prep caused THC exceedance.	Reviewed feed prep. Restarted unit.	0	30	59
7	THC	1/25/2009 10:42:23 PM	1/25/2009 11:23:22 PM	Operator Error - Poor Operation	Contamination of scrubber water caused THC events.	Scrubber switched to city water. W-4&5 cleaned.	0	40	59
8	THC	1/26/2009 12:24:22 AM	1/26/2009 12:43:24 AM	Operator Error - Poor Operation	Contamination of scrubber water caused THC events.	Scrubber switched to city water. W-4&5 cleaned.	0	19	2
9	THC	1/26/2009 2:01:23 AM	1/26/2009 2:53:21 AM	Operator Error - Poor Operation	Contamination of scrubber water caused THC events.	Scrubber switched to city water. W-4&5 cleaned.	0	51	58
10	THC	1/26/2009 3:43:26 AM	1/26/2009 4:43:22 AM	Operator Error - Poor Operation	Contamination of scrubber water caused THC events.	Scrubber switched to city water. W-4&5 cleaned.	0	59	56

** End of report **

HERITAGE-WTI, Inc.

1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

ISO 9001



ISO 14001

March 4, 2009
VIA UPS



Mr. George Czerniak, Chief
U.S. EPA Region V
Air Enforcement and Compliance Assurance
Branch
Mail Code AE-17J
77 West Jackson
Chicago, IL 60604

Ms. Pamela Korenewych
OEPA-DAPC-NEDO
Environmental Specialist
2110 E. Aurora Road
Twinsburg, OH 44087

RE: HERITAGE-WTI, INC.
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage-WTI, Inc. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray
Vice President & General Manager
Heritage-WTI, Inc.

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



Recycled Paper

MACT EXCESSIVE EXCEEDANCE REPORT

Heritage-WTI, Inc

March 4, 2009

Events

#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	1/26/2009 5:17:22 AM	1/26/2009 6:23:21 AM	Operator Error - Poor Operation	Contamination of scrubber water caused THC events.	Scrubber switched to city water. W-4&5 cleaned.	1	5	59
2	THC	1/26/2009 9:36:23 AM	1/26/2009 10:33:22 AM	Operator Error - Poor Feed Prep	Improper material prep caused THC exceedance.	Reviewed feed prep. Restarted unit.	0	56	59
3	THC	2/14/2009 11:24:28 AM	2/14/2009 12:23:29 PM	Operator Error- Poor Feed Prep	Poor feed prep caused THC exceedance	Restarted unit.	0	59	1
4	THC	2/18/2009 7:21:16 PM	2/18/2009 7:47:31 PM	Operator Error- Poor Feed Prep	Improper material prep caused THC exceedance.	Reduce charge size. Restart unit.	0	26	15
5	THC	2/18/2009 11:10:24 PM	2/19/2009 12:09:33 AM	Operator Error- Poor Feed Prep	Improper material prep caused THC exceedance.	Reduce charge size. Restart unit.	0	59	9
6	RJ DP	2/21/2009 3:32:23 AM	2/21/2009 3:37:27 AM	Operator Error - Poor Operation	Operator failed to take corrective action to maintain OPL	Restarted unit.	0	5	4
7	SCC Pressure Using Seals	2/21/2009 7:47:22 PM	2/21/2009 7:47:29 PM	Operator Error - Poor Feed Prep	Drum charge too large causing pressure trip.	Restarted unit.	0	0	7
8	THC	2/24/2009 3:19:27 PM	2/24/2009 3:46:29 PM	Operator Error - Poor Feed Prep	Improper material prep caused THC exceedance.	Restarted unit.	0	27	2
9	THC	2/25/2009 2:48:22 AM	2/25/2009 3:47:21 AM	Operator Error - Poor Feed Prep	Improper material prep caused THC exceedance.	Restarted unit.	0	58	59
10	THC	2/28/2009 9:27:25 AM	2/28/2009 10:27:23 AM	Operator Error - Poor Feed Prep	Improper material prep caused THC exceedance.	Reduced charge size and restarted unit.	0	59	58

*** End of report ***